

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ON ) Civil Action No. 03 MDL 1570 (GBD) (SN)  
SEPTEMBER 11, 2011 )  
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This document relates to:

*Underwriting Members of Lloyd's Syndicates 2 v. Al Rajhi Bank*, No. 16-cv-07853 (GBD)  
*Abarca v. Kingdom of Saudi Arabia*, No. 17-cv-03887 (GBD)  
*Abedhajajreh v. Kingdom of Saudi Arabia*, 17-cv-06123 (GBD)  
*Addesso v. Kingdom of Saudi Arabia*, No. 16-cv-09937 (GBD)  
*Aguilar v. Kingdom of Saudi Arabia*, No. 16-cv-09663 (GBD)  
*Aiken v. Kingdom of Saudi Arabia*, No. 17-cv-00450 (GBD)  
*Arrowood Indemnity Co. v. Kingdom of Saudi Arabia*, No. 17-cv-03908 (GBD)  
*Charter Oak Fire Ins. Co. v. Al Rajhi Bank*, No. 17-cv-02651 (GBD)  
*Hodges v. Kingdom of Saudi Arabia*, No. 17-cv-00117 (GBD)

## **NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, pursuant to Rules 7(b) and 12(b)(2) and (6) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, Defendant Saudi Binladin Group (“SBG”) hereby appears for the purpose of moving the Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order dismissing all of the claims asserted against SBG for want of personal jurisdiction and, in the alternative, for failure to state a claim. A memorandum of law in support of this Motion is filed herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to a scheduling order issued by the Honorable Sarah Netburn (MDL Dkt. No. 3584), any opposing papers shall be filed electronically no later than October 20, 2017.

Dated: August 21, 2017

Respectfully submitted,

By: /s/ James E. Gauch

Mary Ellen Powers

James E. Gauch

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001-2113

Tel: (202) 879-3939

Fax: (202) 626-1700

Email: [mepowers@jonesday.com](mailto:mepowers@jonesday.com)

Email: [jegauch@jonesday.com](mailto:jegauch@jonesday.com)

Fahad A. Habib

JONES DAY

555 California Street, 26th Floor

San Francisco, CA 94104

Telephone: (415) 626-3939

Facsimile: (415) 875-5700

Email: [fahabib@jonesday.com](mailto:fahabib@jonesday.com)

*Counsel for Defendant Saudi Binladin Group*

**CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the foregoing upon all counsel of record via ECF on August 21, 2017, including counsel for all of the parties to the following cases:

*Underwriting Members of Lloyd's Syndicates 2 v. Al Rajhi Bank*, No. 16-cv-07853 (GBD)  
*Abarca v. Kingdom of Saudi Arabia*, No. 17-cv-03887 (GBD)  
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Dated: August 21, 2017

Respectfully submitted,

/s/ James E. Gauch  
James E. Gauch  
JONES DAY  
51 Louisiana Avenue, NW  
Washington, DC 20001  
Telephone: 202-879-3939  
Facsimile: 202-626-1700  
Email: [jegauch@jonesday.com](mailto:jegauch@jonesday.com)